

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

TELCORDIA TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 04-876-GMS
	)	
CISCO SYSTEMS, INC.,	)	
	)	
Defendant.	)	

**PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S  
OBJECTIONS TO DEFENDANT CISCO SYSTEMS INC.'S  
NOTICE OF DEPOSITION OF RICHARD LAU**

Plaintiff Telcordia Technologies, Inc. ("Telcordia"), by its attorneys, hereby objects to Defendant Cisco Systems, Inc.'s ("Cisco") Notice of Deposition of Richard Lau.

**OBJECTIONS**

1. Telcordia objects to the use, including use by other parties, of any testimony from the noticed deposition in separate cases, such as the pending suits against Alcatel and Lucent (Telcordia Technologies, Inc. v. Alcatel USA, Inc. Civil Action No. 04-874-GMS and Telcordia Technologies, Inc. v. Lucent Technologies, Inc., Civil Action No. 04-875-GMS).

2. Telcordia objects to the extent that this deposition in combination with depositions of other witnesses would cause Cisco to exceed any of the limits on depositions set forth in the Federal Rules of Civil Procedure.

ASHBY & GEDDES

/s/ *Tiffany Geyer Lydon*

*Of Counsel:*

Donald R. Dunner  
Don O. Burley  
Steven M. Anzalone  
Richard H. Smith  
Houtan K. Esfahani  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.  
901 New York Avenue, N.W.  
Washington, D.C. 20001-4413  
(202) 408-4000

York M. Faulkner  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.  
Two Freedom Square  
11955 Freedom Drive  
Reston, VA 20190-5675  
(571) 203-2700

Dated: May 5, 2006  
169224.1

---

Steven J. Balick (I.D. #2114)  
John G. Day (I.D. #2403)  
Tiffany Geyer Lydon (I.D. #3950)  
222 Delaware Avenue, 17<sup>th</sup> Floor  
P.O. Box 1150  
Wilmington, Delaware 19899  
(302) 654-1888  
[sbalick@ashby-geddes.com](mailto:sbalick@ashby-geddes.com)  
[jday@ashby-geddes.com](mailto:jday@ashby-geddes.com)  
[tlydon@ashby-geddes.com](mailto:tlydon@ashby-geddes.com)

*Attorneys for Plaintiff  
Telcordia Technologies, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of May, 2006, the attached **PLAINTIFF**  
**TELCORDIA TECHNOLOGIES, INC.'S OBJECTIONS TO DEFENDANT CISCO**  
**SYSTEMS INC.'S NOTICE OF DEPOSITION OF RICHARD LAU** was served upon the  
below-named counsel of record at the address and in the manner indicated:

Jack B. Blumenfeld, Esquire  
Morris, Nichols, Arsht & Tunnell  
1201 North Market Street  
Wilmington, DE 19899-1347

**HAND DELIVERY**

Matthew D. Powers, Esquire  
Weil, Gotshal & Manges LLP  
201 Redwood Shores Parkway  
Redwood Shores, CA 94065

**VIA FEDERAL EXPRESS**

*/s/ Tiffany Geyer Lydon*

---

Tiffany Geyer Lydon